



District of Columbia
Office of the State Superintendent of Education



Student Enrollment Audit Handbook

Guide for Community Based Organizations (CBOs)

School Year 2021-22

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1. DEFINITIONS FOR COMMON ACRONYMS AND TERMS

Term/Acronym	Definition
BOX	Cloud-based collaboration tools to transfer data (residency documentation, requests, etc.)
CBO	Community-based organization
CFSA	Child and Family Services Agency
DC	District of Columbia
DCMR	District of Columbia Municipal Regulations
DCPS	District of Columbia Public Schools
DCRV	District of Columbia residency verification form issued by OSSE annually for use by local education agencies (CBOs) and CBOs in verifying residency
DE	Duplicative enrollment
DEL	Division of Early Learning
Duplicative Enrollment resolution process	The process used to resolve duplicative enrollments between CBOS. In most cases, this process is conducted through the Duplicative Enrollment Application.
DME	Office of the Deputy Mayor for Education
e-File	Residency documentation file prepared for a remote audit
Enrollment Audit and Child Count Application (EACCA)	An OSSE application that displays the enrollment audit and Child Count rosters and student-level data to CBOs and facilitates the audit process through recording the result of each phase of the audit, including auditor results, CBO appeals and documentation submission
FERPA	Family Educational Rights and Privacy Act
LEA	Local education agency
MKV	McKinney-Vento Homeless Assistance Act
OCFO	Office of the Chief Financial Officer
OER	Office of Enrollment and Residency
OSSE	Office of the State Superintendent of Education
PKEEP	Pre-K Enhancement and Expansion Program
Pre-K 3	Pre-kindergarten for 3-year-olds
Pre-K 4	Pre-kindergarten for 4-year-olds
POC	Point of Contact
SEA	State education agency
SEAM	Statewide Enrollment Audit Manager
SNAP	Supplemental Nutrition Assistance Program
SY	School year
TANF	Temporary Assistance for Needy Families
UPSFF	Uniform Per Student Funding Formula
USI	Unique Student Identifier

2. OVERVIEW

2.1. Purpose

Under 5A DCMR § 3504.3 and DC Official Code § 38-1804.02, the Office of the State Superintendent of Education (OSSE) is required to annually collect enrollment counts for children in high-quality pre-K 3 (PK3) and pre-K 4 (PK4) programs in community-based organizations (CBOs), as of Oct. 5 of each school year. A high-quality CBO pre-K program is a program providing pre-K education services to pre-K age children operated by a CBO, designated by OSSE through the Pre-K Enhancement and Expansion Program (PKEEP) as a program meeting and maintaining the high quality standards and eligibility criteria pursuant to DC Official Code § 38-272.01 or as provided 5A DCMR §3500 *et seq.* OSSE is then required to conduct an annual audit to verify the accuracy of the enrollment counts, as well as to identify any material weaknesses, if any, in the enrollment systems, procedures, or methodology at the CBO level. OSSE reports the results of the audit to the Mayor, the Council of the District of Columbia, and the appropriate Congressional committees.

2.2. Applicable Legislation

Sections 102, 106 and 501 of the Pre-K Enhancement and Expansion Amendment Act of 2008 (DC Law 17-202; DC Official Code §§ 38-271.01, *et seq.*)

Section 3502 of the District of Columbia Municipal Regulations (DCMR) Title 5-A, Chapter 5 (5-A 35 DCMR § 3502)

2.3. Scope

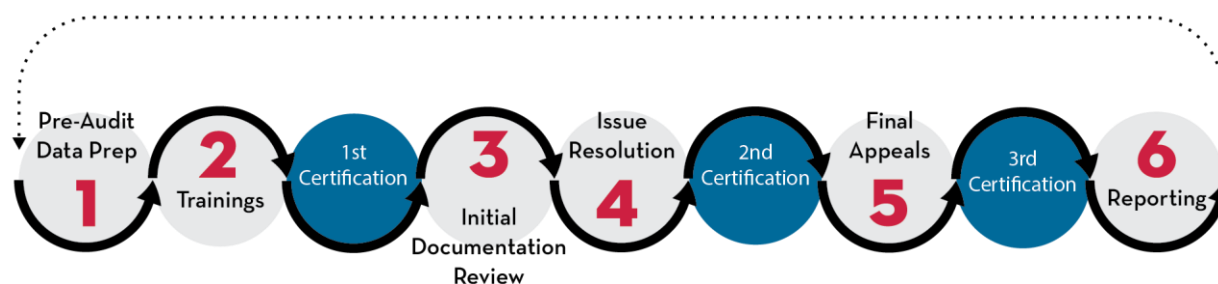
The enrollment audit for CBOs is an audit of children enrolled in pre-K 3 and pre-K 4 in CBOs receiving PKEEP funds. It includes three components:

1. **Residency Verification:** An audit of children enrolled in pre-K 3 and pre-K 4 in community-based organizations receiving PKEEP funds. Upon completion of the enrollment audit, each CBO receives funding for each enrolled preschool-aged student verified as a District resident.
2. **Age Verification:** Confirmation that enrolled student meets the age requirements under the PKEEP regulations.
3. **Verification of At-Risk Status:** Determination of whether a pre-K student qualifies as at-risk (students in foster care, who are experiencing homelessness or receive Temporary Assistance for Needy Families (TANF), or Supplemental Nutrition Assistance Program (SNAP) benefits) and is eligible for a supplemental funding allocation.

2.4. PKEEP Funding

The PKEEP funding rate for 2021-22 school year is \$15,718 for 3-year-olds and \$15,249 for 4-year-olds. The supplemental at-risk allocation is \$2,815 for pre-K age students in foster care, who are experiencing homelessness, or receive TANF or SNAP benefits.

3. ENROLLMENT AUDIT AND CHILD COUNT PROCESS OVERVIEW



3.1. 2021-22 EACC Calendar

2021 DATE	EVENT/DELIVERABLE
Pre-Audit Data Preparation Phase (Prior to Oct. 5)	
April – September	Pre-Audit Data Preparation Phase: CBOs update data in EACCA
August	CBOs updates POCs with Division of Early Learning (DEL), at pkeep.osse@dc.gov .
August 3	Mandatory Enrollment Audit Child Count Training
Ongoing	CBO Pre-K Managers submit changes to CBO name, contact or site directory to DEL
Sept. 13	CBOs receive notification of the Enrollment Audit Workflow Schedule. Audit Workflow Schedule will be in the EACCA.
Data Freeze (Oct. 5)	
Oct. 5	CBO to ensure all enrolled students are included on the roster by 4 p.m.
Oct. 6 – 11	CBOs review and make final corrections to data in the EACCA for student inclusion/exclusion on the enrollment roster to ensure annual funding based on the UPSFF; Oct 11 at 4 p.m. is the final opportunity for CBOs to submit requests for missing students.
Oct. 12	CBOs submit First Certification (Unaudited Enrollment and Child Count Anomalies Acknowledgement) in the EACCA. 9 a.m.-5 p.m.
Initial Documentation Review Phase (Oct. 18 – Nov. 12)	
Oct. 12 – 22	Appeal window for duplicative enrollment determinations made during enrollment period one
Varies by CBO*	E-file submission deadline for CBOs participating in a remote Initial documentation review phase.
Varies by CBO*	Initial Documentation Review: CBOs prepare for auditors to review e-file binders remotely
Issue Resolution Phase (Oct. 20 – Dec. 3)	
Varies by CBO*	Issue Resolution: Initial residency determinations from the remote audit are available for CBO review in the EACCA. CBOs upload supporting documentation to resolve residency determinations found during the emote audit.
Oct. 29	Final day for CBOs to submit requests for Demographic Data corrections
Nov. 14	CBOs shall resolve all demographic errors in appropriate source system by 4 p.m.

Nov. 15	CBOs submit the Second Certification (Final Demographic Data Elements) in the EACCA. 9 a.m.-5 p.m.
Final Appeals Phase (Dec. 3 – Dec. 15)	
Dec. 3	CBOs submit requests with supporting documentation for final appeals for residency issues in the EACCA by 11:59 p.m.
Dec. 6 – 7	CBOs receive notification of granted final appeals via the EACCA
Dec. 8 – 10	Final Appeals Phase: OSSE facilitates final appeals for residency
Dec. 15	CBOs can view all final determinations in the EACCA
Dec. 16	CBOs submit Third Certification (Final Audited Enrollment Numbers Certification) in the EACCA. 9 a.m.-5 p.m.

*Phase dates overlap as a collective, but not for individual CBOs. Please see the Enrollment Audit Workflow Schedule in the EACCA for CBO specific dates.

3.2. Enrollment Data Certifications

CBOs shall certify the validity, completeness and accuracy of the CBOs' data and acknowledge final enrollment numbers by completing three enrollment audit certifications within the EACCA.

1. The first certification captures the universe of students enrolled in the CBO's PKEEP classroom, each of whom should be included in the enrollment audit. The first certification also confirms that the correct subsidy status is marked for each enrolled student.
2. The second certification certifies that the demographic data (e.g., name, date of birth, address) for each PKEEP student are accurate, valid and complete.
3. The third and final certification captures the acknowledgment of final enrollment numbers and demographic information used for funding.

All certifications shall be made by the Pre-K Manager via electronic signature in the EACCA.

Certification Name	2021 Due Date	Purpose of Certification
First Certification - Unaudited Enrollment and Subsidy Recipient Acknowledgement	Oct. 12 9 a.m.-5 p.m.	<ul style="list-style-type: none">● CBO acknowledges that enrollment data in the EACCA includes all students enrolled at the CBO as of Oct. 5● CBO acknowledges that enrollment data includes accurate identification of subsidy recipient students● Failure to complete this certification means that OSSE will consider the CBO's Oct. 5, 2021 data to be accurate through passive approval for the purposes of the enrollment audit and will utilize that enrollment roster, as is, for the audit
Second Certification - Final Demographic Data Elements	Nov. 15 9 a.m.-5 p.m.	<ul style="list-style-type: none">● CBO acknowledges that the demographic data for each PKEEP student in the EACCA are accurate, valid and complete for all students enrolled at the CBO as of Oct. 5, 2021 (outside of residency and duplicative enrollments);● Failure to complete this certification means that OSSE will consider the CBO's enrollment audit data elements for all students enrolled at the CBO as of Oct. 5, 2021 to be accurate, valid, and complete through passive approval for the purposes of the enrollment audit
Third Certification - Final Audited Enrollment Numbers Acknowledgment	Dec. 16 9 a.m.-5 p.m.	<ul style="list-style-type: none">● Acknowledges the final audited PKEEP enrollment numbers after the final appeals process is complete.

4. PRE-AUDIT DATA PREPARATION



CBOs have from **now until Oct. 5 at 4 p.m.** to make input student records (and edit/update records) to student enrollment in the EACCA to ensure all students enrolled on Oct. 5 are identified correctly in the EACCA. CBOs must handle personally identifiable information (PII) of students to complete the Enrollment Audit and Child Count requirements. The CBO shall follow all applicable Family Education Rights and Privacy Act (FERPA) laws accordingly.

4.1. Data Quality Terms

All data shall be valid, complete and accurate. Under federal and local law, CBOs are responsible for maintaining records for data reporting. For the purposes of the enrollment audit, OSSE defines maintenance of records as:

- entering accurate data;
- updating data promptly and accurately upon notification of any changes; and
- ensuring accuracy so the system of record correctly reflects all students and their environments under the purview of the CBO.

Term	Definition
Accurate	The data correctly represents reality
Valid	All values entered conform to OSSE-permitted values*
Complete	All required data elements contain values

*OSSE-permitted values can be found in the data elements section (4.4) below.

4.2. Residency Verification

All pre-K 3 and pre-K 4 students for whom a CBO receives Pre-K Enhancement and Expansion Program (PKEEP) funds shall be residents of the District of Columbia. To establish bona fide residency, the person enrolling the students shall demonstrate compliance with all three of the following requirements, annually:

- If anyone other than the parent is enrolling the student, establish that they are the valid guardian, custodian, or other primary caregiver, as set forth in 5-A DCMR § 5000 et seq. and specifically defined in 5-A DCMR § 5099, with proper documentation such as a custody order, or an “other” primary caregiver form;
- Establish a physical presence in the District, defined as the “actual occupation and inhabitation of a place of abode with the intent to dwell for a continuous period of time”; and

- c) Submit valid and proper documentation that establishes bona fide residency as set forth in 5-A DCMR § 5004. The student residency verification process requires CBOs review documentary proof of residency during the enrollment period each year (Summer 2021 through Oct. 5). CBOs are required to review each students' residency documentation and verify that all documentation and verification forms are complete, legible, and valid prior to Oct. 12, the first certification date.

See the [OER Handbook](#) and training for more information on the required residency documentation and refer to the COVID-19 related [OSSE Guidance Documents](#) for updated guidance on enrollment and residency verification in response to coronavirus (COVID-19).

4.3. Age Verification

CBOs are required to collect documentation that verifies the student's date of birth. Pre-K3 students shall be 3 years old by Sept. 30, 2021, and pre-K4 students shall be 4 years old by Sept. 30, 2021.

Acceptable documents for verification of a child's age include one of the following:

1. A full size original birth certificate. The birth certificate shall include the name of the parent(s) or guardian(s) requesting services:
2. A birth certificate in a non-English language with a certified translation.

4.4. Ensuring Accurate, Complete and Valid Student Records

CBOs shall ensure all students enrolled in the PKEEP are accurately reflected in the EACCA. CBOs have until Nov. 14, 2021, 4 p.m. to make changes in the EACCA to the data elements listed below. This ensures student data were entered correctly in the application.

Data element	Definition
Last Name	The legal last name of the student. It is the name carried in common by members of a person's family, or the last name recognized as the formal and content last name given to a person after birth (e.g., birth, baptism or other naming ceremony certificate; or birth verification document) or through legal action (e.g., marriage, divorce, adoptions or legal name change).
First Name	The legal first name of the student. It is the name given to an individual after birth (e.g., birth, baptism or other naming ceremony certificate; or birth verification document) or through legal action (e.g., marriage, divorce, adoption or through legal name change).
Date of Birth (DOB)	The day, month and year on which the student was born documented on an official government certificate.
Street Address	The number and name of the unit and street (and apartment, if applicable) where the student resides.
City	The city where the student resides.
State	The abbreviation for the state (within the United States) or outlying area in which the student resides.

Zip Code	The number that identifies the postal delivery area in the United States in which the student resides.
Gender	A coded value representing the student's gender. Gender is a person's actual sex or perceived sex and includes a person's perceived identity, appearance or behavior, whether that identity, appearance, or behavior is different from that traditionally associated with a person's sex at birth.
Ethnicity	CBOs are required to categorize student ethnicity as "Yes – Hispanic or Latino" or "No – Not Hispanic or Latino" for the ethnicity with which the student most closely identifies. The complete definition of Hispanic and Latino is found in Appendix 13.1.
Race	CBOs are required to categorize students in one or more of the five permitted race codes for which race(s) the student most closely identifies. Categories shall be mapped by the CBO to the five federal race categories: American Indian and Alaska Native – Non-Hispanic/Latino, Asian – Non-Hispanic/Latino, Black or African American – Non-Hispanic/Latino, Native Hawaiian or Other Pacific Islander – Non-Hispanic/Latino, White – Non-Hispanic Latino. More complete definitions of these race classifications are found below in Appendix 13.1.
Grade Level	The grade level or primary instructional level at which a student enters and receives services in a school or an educational institution during a given academic session, as permitted in the EACCA, and aligned to data elements in Appendix 13.1.
Residency Status	The CBOs determination that the student is or is not a resident of the District of Columbia based on provided documents to support residency claim.
Homeless	Individuals who lack a fixed (permanent), regular, and adequate (acceptable) nighttime residence; or as defined in McKinney-Vento.

4.5. Enrollment Audit and Child Count Application

The Enrollment Audit and Child Count Application (EACCA) is the web-based platform for community-based organizations (CBOs) to enter student enrollment data for the PKEEP classrooms. This application is used for both Local Education Agencies (LEAs) as well as CBOs. "Child Count" only applies to LEAs and is a federally mandated activity that serves as the official special education enrollment number for the District of Columbia.

The application allows OSSE to view the individual student records and enrollment rosters throughout each phase of the audit. Student rosters are created from data pulled from the data the CBO enters directly into the EACCA. The EACCA:

- Provides a secure method to upload student residency and age verification documentation for appeals, eliminating the need to upload multiple versions of excel spreadsheets;
- Allows CBOs to view in near-real time, enrollment student counts as they relate to the enrollment audit;
- Allows CBOs to view in near-real time, enrollment and residency determinations throughout the Initial documentation Review, Issues Resolution and Final Appeals phases; and
- Enhances OSSE's communication to CBOs throughout the enrollment audit phases.

4.6. Data Snapshot of Enrollment Data as of Oct. 5

OSSE takes a snapshot of enrollment data on Oct. 12 collected from all CBOs to reflect the enrollment as of Oct. 5. CBOs have **until Oct. 11 at 4 p.m.** to make corrections to student enrollment in the EACCA to ensure all enrolled students are identified correctly in the EACCA for the First Certification on Oct. 12.

4.7. Technical Assistance

OSSE has assigned CBOs an OSSE CBO Liaison within OER, Antonio Cannon who can be contacted at antonio.cannon@dc.gov. Additionally, the DEL POC can be contacted at pkeep.osse@dc.gov.

4.8. CBO Points of Contact (POCs)

Each CBO is required to have POCs for the annual enrollment audit. Each POC plays a critical role in the enrollment audit (see chart below).

Participating in the enrollment audit requires CBO POCs to handle personal identifiable information of students; therefore, CBOs shall follow all applicable Family Education Rights and Privacy Act (FERPA) laws accordingly.

OSSE will not contact or communicate with CBO staff members beyond the Pre-K Manager and the designated enrollment audit POC for the enrollment audit. CBOs with multiple staff working on the enrollment audit are advised to develop a plan for sharing enrollment audit information among their respective staff members as necessary.

The current list of POCs is available for CBOs to review with the designated OSSE POC. Changes throughout the school year shall be communicated to OSSE. The Pre-K Manager shall contact the OSSE CBO POC at pkeep.osse@dc.gov, to submit changes to site information. CBOs should also include osse.enrollmentaudit@dc.gov on all enrollment audit communications to ensure all relevant staff receive necessary updates.

POC Type	Description
Pre-K Manager	Responsible for overall management and administration; completes all certifications for the enrollment audit
CBO Enrollment Audit POC	Coordinates and manages the enrollment audit, including ensuring deadlines are met, reviewing data for accuracy and completeness, preparing for site visits, coordinating documentation, and uploading documents

4.9. Residency Documentation Preparation

All CBOs are required to complete the enrollment audit using the e-file method for the 2021-22 SY. Document preparation instructions for e-file document reviews can be found in the [Initial Documentation Review](#) section.

4.10. Audit Workflow Scheduling

The audit workflow lays out each CBO's timeline for completing the enrollment audit. Audit workflow schedules are uploaded into the EACCA in August. The CBO is responsible for reviewing the dates listed in the audit workflow table and ensuring all deadlines are met.

Audit Workflow Dates						
CBO Name	e-file Deadline	CBO Box Access Removed	Initial Documentation Review Start Date	Initial Documentation Review End Date	Issue Resolution Start Date	Issue Resolution End Date
Educare of Washington	June 22nd 2021, 11:59:00 pm		May 24th 2021, 12:00:00 am	May 25th 2021, 11:59:59 pm	June 24th 2021, 12:00:00 am	May 25th 2021, 11:59:59 pm

*Note: this is a mock and not real data for the audit.

5. ENROLLMENT AUDIT TRAININGS



To ensure that CBO Enrollment Audit POCs have a strong understanding of any policy or process changes regarding the yearly enrollment audit, OSSE hosts several trainings in advance of the initial documentation review phase targeted toward the CBOs Enrollment Audit Point of Contact (POC). CBOs shall send at least one participant for EACCA trainings. OSSE may inform the Pre-K Manager if no representative from their CBO attends the training.

5.1. Enrollment Audit Child Count Application Training

The EACC portion of the training aims to inform CBO Enrollment Audit POCs on the enrollment audit, its application, purpose, and timeline. The EACCA portion of the training aims to inform CBO Enrollment Audit POCs on the key application relevant to the enrollment audit. The training is a collaborative effort between OER and the Office of the Chief Information Officer (OCIO). The training involves technical guidance and processes necessary to successfully navigate the enrollment audit. The training will include BOX functionality, guidance to avoid upload errors and steps to troubleshoot prior to submitting a request for technical support from OSSE. All enrollment audit POC's are encouraged to attend the session each school year.

5.2. Pre-K Manager Training

The Pre-K Manager Training provides CBO Pre-K Managers with guidance on how to complete certification at the three certification points during the enrollment audit. It is encouraged for ALL Pre-K Managers to attend the session each school year.

6. FIRST CERTIFICATION: UNAUDITED ENROLLMENT CERTIFICATION



The first certification of data is crucial to each CBO's success in the enrollment audit. It is the best time to flag any data issues and ensure that the CBO receives the full amount of PKEEP funding for each PKEEP student confirmed eligible through the Enrollment Audit. The first certification pupil counts are used to determine the CBO's PKEEP Funding. The key dates and actions are:

Oct. 5 at 4 p.m.

OSSE freezes enrollment data submitted by CBOs.

Oct. 6 through Oct. 11 at 4 p.m.

CBOs review their data in the EACCA to ensure that all students enrolled in the PKEEP classroom(s) as of Oct. 5 are accounted for on the roster. This includes:

- Resolving duplicative enrollment with another CBO or local education agency (LEA);
- Making corrections to student records in the EACCA to ensure all demographic data for students enrolled in PKEEP are accurate; and
- Reviewing and confirming that all subsidy recipients are correctly identified.

After Oct. 11

CBOs cannot add additional students to the enrollment audit roster under any circumstances after 4 p.m. on Monday, Oct. 11, 2021. It is critical that the CBO ensures that **all students for whom the CBO seeks Pre-K Enhancement and Expansion funding**, based on the fiscal year 2022 projected enrollment (i.e., attending as of Oct. 5) are on the enrollment audit roster in the EACCA.

Oct. 12 at 5 p.m.

Pre-K Managers shall complete the first certification in the EACCA between 9 a.m. and 5 p.m.

6.1. Amending the Unaudited Enrollment Roster after First Certification

CBOs are responsible for certifying accurate, complete and valid student data. In the event the data certifies is incorrect, the CBO shall complete the following steps to resolve.

Adding a Student

If a CBO determines that a student should be added to the PKEEP student roster in the enrollment audit child count application, the CBO should complete the below steps. Please note that OSSE's Chief Information Technology (CIO) team will process requests.

1. CBO submits request to add missing student(s) into the EACCA
 - a. Note: The request must be submitted directly to the DEL POC at pkeep.osse@dc.gov.
 - b. Once the DEL POC acknowledges receipt of the request, the COB will submit the below data elements for the requested students through the CBOs Box portal in a pdf. The request should include:
 - i. The date the student enrolled into the PKEEP classroom
 - ii. Explanation for why the student was not included in the data capture
 - iii. Student information (first name, middle, last name, USI and DOB)
2. CBO contacts the DEL PKEEP POC at pkeep.osse@dc.gov to confirm that the student record(s) was submitted to BOX)
3. OSSE sends CBO notification indicating that the request is accepted, rejected, or to request additional information

Removing a Student

If a CBO determines that a student should be removed from the PKEEP student roster in the enrollment audit child count application, the CBO should complete the below steps. Please note that OSSE's Chief Information Technology (CIO) team will process requests.

2. CBO submits request to remove student(s) from the EACCA
 - b. Note: The request must be submitted directly to the DEL POC at pkeep.osse@dc.gov.
 - c. Once the DEL POC acknowledges receipt of the request, the COB will submit the below data elements for the requested students through the CBOs BOX portal in a pdf. The request should include:
 - i. The date the student unenrolled into the PKEEP classroom
 - ii. Student information (first name, middle, last name, USI and DOB)
3. CBO contacts the DEL PKEEP POC at pkeep.osse@dc.gov to confirm that the student record(s) was submitted to Box)
4. OSSE sends CBO notification indicating that the request is accepted, rejected, or to request additional information

7. INITIAL DOCUMENTATION REVIEW



The initial documentation review phase of the enrollment audit is the process wherein OSSE auditors review residency documentation remotely starting Monday, Nov. 15, 2021 and ending on Friday, Nov. 19, 2021. **Initial documentation review dates can be found in the EACCA, within the overall Audit Workflow Schedule.**

7.1. Enrollment Audit Initial Documentation Review Scope

OSSE auditors will review every student's DC Residency Verification form (DCRV) as well as any supporting residency forms when applicable (Other Primary Caregiver Form, Sworn statement, etc.). OSSE's review of supporting residency documentation will depend on whether an individual PKEEP student participates in the District's subsidized childcare program.

Non-subsidy students

Students who do not participate in the subsidized childcare program shall have **a completed DCRV form, valid supporting residency documentation and age verification documentation.** Information on valid supporting documentation can be found in the Residency Verification section of this handbook and at [the OSSE Enrollment Audit website](#). If the supporting documentation is ultimately rejected by the auditor, that student will be counted as an unverified resident or flagged for an age error and the CBO will not receive funding for that student.

Subsidy students

Students who participate in the District of Columbia's subsidized childcare program **will only need** a completed DCRV form but do not need to provide valid supporting residency documentation. These students must be accurately identified by the CBO. The CBO will be responsible for reviewing and confirming the subsidy student information in the EACCA. If the CBO determines that a subsidy student was not captured in the OSSE verification process, the CBO can submit an issue resolution and submit the required valid supporting residency documentation to confirm eligibility and enrollment in the PKEEP.

7.2. Supporting Residency Documentation Preparation

All CBOs are required to complete their initial documentation review remotely.

7.2.a. Document Preparation for Remote Document Review

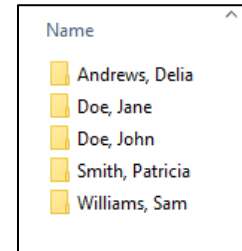
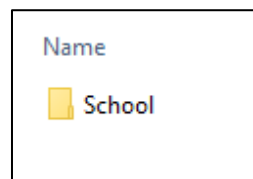
CBOs must complete their initial documentation review through a remote documentation review. A remote document review requires the creation and submission of e-files. For the 2021-22 school year, OSSE will use BOX as the platform for providing the e-files. The EACCA will have a link directly to the school folder in BOX for uploading enrollment audit e-files. The e-files must contain the required documentation for all enrolled students.

Location of E-file Folder for Upload

1. CBOs have several folders within BOX, relevant to different purposes with OSSE. The e-file uploads should be uploaded to the **CBOs BOX folder named “Enrollment Audit E-file.”**
2. BOX access will be based upon the CBO Enrollment Audit POC role. CBOs must ensure the appropriate staff member(s) are **assigned as the CBO Enrollment Audit POC provided by DEL in the Pre-Audit Phase.**

Prepare Student e-files for Remote Review

1. Organize the DCRV form and all applicable residency verification forms and supporting residency documentation (i.e., OPC Form) into 15 GB (max) .pdf files.
2. Files should be created and loaded into the Enrollment Audit BOX folder in the following order:
 - a. School
 - b. Student last name, student first name
 - i. Student names shall align with spellings as displayed in the EACCA
 - ii. Include student date of birth if more than 1 student has the same first and last name



3. If a school’s Enrollment Audit Population folder exceeds the file size limits, break the group in half, alphabetically by last name (Ex. A-M, N-Z)
4. In each student folder, the supporting residency documentation should immediately follow the DCRV form for that student.
5. Age verification documents should immediately follow the residency documentation
6. Submit final e-files by designated e-file due date in the EACCA – CBOs will have access to the folders up through this date to change as needed.

While e-files are due on e-file due date listed in the EACCA, CBOs will still be assigned an initial documentation review day that initiates the phases of issue resolution. Details on these dates will be released with the audit workflow schedule in the EACCA.

7.3. Initial Documentation Review Day

E-file

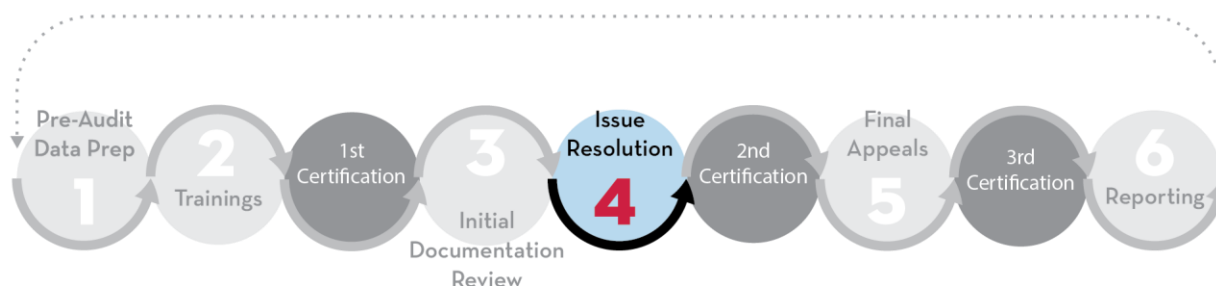
All CBOs will be assigned an Initial Documentation Review date. This date is when the auditors will begin remote review of documentation and recording of determinations. It is also the start date for all subsequent follow-up requirements to be completed by the CBO.

7.4. Initial Documentation Review Closure

E-file

At the conclusion of the remote document review, the CBO will be able to view Initial Documentation Review determinations in the EACCCA.

8. ISSUE RESOLUTION



During the issue resolution phase, CBOs shall respond to auditor rejections from the initial document review phase. Depending on the issue or rejection, CBOs shall respond to auditors and OSSE as promptly as possible during this period to ensure timeliness of data reconciliation through BOX, phone, email and the EACCA.

8.1. Issue Resolution Response

The timeline for issue resolution is CBO-specific and outlined in the EACCA Audit Workflow Table. Each CBO shall be responsible for reviewing their issue resolution timeline and ensuring all deadlines are met. CBOs can review the status of each student in the EACCA at the start of their issue resolution phase. The issue resolution timeline will not follow the strict business day counts used in prior enrollment audits. The auditor review time may be different depending on CBO enrollment size and the enrollment sizes of other CBOs scheduled on the same day. However, CBOs will have **five business days** during issue resolution to respond to all auditor determinations from the initial document review phase.

When responding to the auditor findings, the uploaded documentation must demonstrate the student's bona fide District residency. See the [OER Handbook](#) for information on required residency documentation and refer to the [COVID-19 related OSSE Guidance Documents](#) for updated guidance on enrollment and residency verification in response to COVID-19.

The documents are then reviewed by OSSE auditors and a second determination is rendered and documented in the EACCA. If the CBO/school does not agree with determinations rendered during the issue resolution phase, a request for a final appeal must be made using the EACCA by **Dec. 3, 2021, 11:59 p.m.** If appealing, CBOs must upload documentation to resolve the student's residency status directly in the EACCA by **Dec. 3, 2021.**

If a CBO fails to respond to a student's non-residency status by the close of the issue resolution response period, the CBO cannot submit a final appeal for the student's residency determination. OSSE considers the residency determination final for students without an issue resolution response from the CBO as acceptance of the auditors' decision.

If the CBO fails to attempt to resolve the student's residency status during the issue resolution phase, a letter of exception must be submitted to OSSE documenting the missed resolution period within five business days of the missed resolution period. Even if a letter is submitted, the decision to allow the exception remains with OSSE. The letter can be sent via email to osse.enrollmentaudit@dc.gov.

8.2. Duplicative Enrollments

If a student is enrolled in more than one CBO or LEA, OSSE will use documentation from the CBOs and attendance records to make an enrollment determination. To resolve a duplicative enrollment, CBOs are required to submit all applicable documentation listed in the hierarchy tables below through the EACCA by **Oct. 22, 2021.** OSSE will evaluate the documents using the hierarchy order identified below to make a determination by **Nov. 5, 2021.**

OSSE will first consider the documentation shared within the first level of the hierarchy identified below. If this documentation does not provide clear and convincing evidence of the student's enrollment for the current school year, then OSSE will consider the totality of the documentation shared in the first and second levels of the hierarchy. If this documentation does not provide clear and convincing evidence of the student's enrollment for the current school year, then OSSE will consider the totality of the documentation shared in the first, second, and third levels of the hierarchy and make a final determination.

If a CBO disagrees with OSSE's determination, the CBO can request a remote appeal in the EACCA by **Dec. 3, 2021.**

Hierarchy order for Duplicatively Enrolled in a CBO and an LEA	Acceptable Documentation
1. Enrollment/Withdrawal Forms	The CBO shall provide current school year enrollment or withdrawal documentation signed by the parent/guardian. The documentation should identify the date the student entered or exited the program and include signatures from the enrolling parent/guardian and a program official. Additionally, if available, the program should provide the Request for Student Records or confirmation from the receiving CBO verifying enrollment or withdrawal.

2. Attendance / Discipline Records	OSSE will review attendance records from Sept. 28 through Oct. 26. For CBOs with an intersession break scheduled during the specified time period, an equivalent number of days for in-school attendance will be added to the end of the stated time. Additionally, if available, the CBO should submit Discipline Records and/or Unusual Incident Report for this stated time period.
3. Schoolwork	The CBO shall submit two pieces of schoolwork or exam documentation that include the student's name, in the student's handwriting where possible, and the date of the work from Sept. 28 through Oct. 26.

8.3. Demographic Data Elements

Demographic data entries for students must be entered directly into the EACCA.

For resolving issues with demographic data elements, CBOs must complete the following:

1. Confirm all demographic data is correct in the EACCA

In the event an CBO has completed all the steps above and has been unable to fix the demographic issue, an email request to antinio.cannon@dc.gov, describing the technical issue the CBO has incurred.

All enrollment audit requests must be submitted by CBOs **no later than Oct. 29, 2021** to ensure adequate time for OSSE to respond before the end of the Issue Resolution phase.

CBOs have **until Nov. 14, 2021 at 4 p.m.** to resolve and correct data directly in the EACCA. CBOs may submit questions about data values for specific students and request support from OSSE on resolving data errors and anomalies through the Box request, particularly for data elements that come from other District agencies.

The following table lays out the data elements tested during the audit and the pathways for resolving errors in the student record during the Issue Resolution phase. (Please also see [Appendix A](#) for a full list of all data elements used in the enrollment audit and their source systems). OSSE recommends resolving errors as quickly as possible within the Issue Resolution period to make sure all necessary changes from the source system to the EACCA are accurately reflected.

Audit Category	Audited data element	Initial Enrollment Audit Determination	Resolution Path for CBO
DC Residency	Residency status	OSSE auditor via site visit	Provide corrected residency documents
Duplicative Enrollment Across CBOs and LEAs	Duplicative Enrollment	OSSE determination after receiving documentation from CBOs, if applicable prior to or on Oct. 29, 2021	Provide required duplicative hierarchy documentation to claim the student as enrolled

Student Demographic Information	Name; Date of Birth; Address; Gender; Ethnicity; Race; Grade	CBO uploads into EACCA	No appeal - data corrected through EACCA by Nov. 14, 2021
At-risk	Homeless	CBO entry of homeless at-risk indicator	No appeal - data corrected through EACCA during issue resolution phase by Nov. 14, 2021
	SNAP/TANF	DC Department of Human Services (DHS) feed	No appeal – CBO submits Box request to resolve inconsistencies by Oct. 29, 2021
	Under the care of CFSA	DC Child and Family Services Agency (CFSA) feed	No appeal – CBO submits Box request to resolve inconsistencies by Oct. 29, 2021

Resolving Demographic Conflict After 2nd Certification

In the event an CBO has completed all the steps above and has been unable to fix the demographic issues after 2nd Certification, a request must be submitted via, BOX, including the [CBO Data Template](#) with the relevant data fields completed.

After the request is submitted, the CBO must email pkeep.osse@dc.gov and Antonio.cannon@dc.gov to provide notification of the request.

9. SECOND CERTIFICATION: FINAL DEMOGRAPHIC DATA ELEMENTS CERTIFICATION



CBOs shall submit the Second Certification (Final Demographic Data Elements Certification) directly in the EACCA no later than 5 p.m. (EST) **on Nov. 15, 2021**.

Through the second certification, the CBO acknowledges that the Nov.14 student demographic data entered into the EACCA are accurate, valid and complete (outside of residency and duplicative enrollment).

Failure to complete this certification means that OSSE will consider the CBO's data to be accurate through passive approval for the purposes of demographic data (excluding disputed residency and duplicative enrollment determinations) for the enrollment audit and will utilize that enrollment roster, as is, for the audit.

10. FINAL APPEALS



If the CBO disagrees with OSSE’s determination of residency or duplicative enrollment (in the Issue resolution phase), the CBO can request a final appeal through the EACCA. **All requests for final appeals for residency status must be received by 11:59 p.m., Dec. 3, 2021.** CBOs will receive the scheduled data and time of the requested final appeal by Dec. 7, 2021.

10.1. Requesting a Final Appeal

Final appeal requests are processed through the EACCA. To request a final appeal to resolve residency determinations CBOs must have:

- 1) Attempted to resolve the residency determination or duplicative enrollment during the issue resolution phase; and
- 2) Submitted additional supporting documentation that verifies the student’s District residency status or confirms enrollment at a duplicative enrolled school.

As part of the final appeals request, the CBO shall upload the residency documentation for review. It is strongly suggested that CBOs request an appeal as soon as corrected documentation is uploaded into the EACCA.

If the CBO fails to attempt to resolve the student’s residency status during the issue resolution phase (and is now not eligible for final appeal), a letter of exception shall be submitted to OSSE documenting the missed resolution period. The letter shall be sent via email to osse.enrollmentaudit@dc.gov.

10.2. Final Appeal Scheduling

Final appeal meetings, if needed, are held from Dec. 8 through Dec. 10. CBOs **must upload additional and/or new documentation** at the time the request for final appeals is made. **All appeals must be requested by Dec. 3, 2021.**

Final appeal meetings are conducted with a panel of OSSE officials and auditors who make the final determination regarding the status of a student. CBO representatives are assigned a time with the panel to review submitted documentation and engage in a focused discussion toward a final determination.

The outcomes of final appeals are updated in the EACCA within one business day. CBOs can view all final determinations by **Dec. 15, 2021.**

11. THIRD CERTIFICATION: FINAL AUDITED ENROLLMENT NUMBERS ACKNOWLEDGEMENT



The third certification shall be completed by the CBO Pre-K Manager POC via electronic signature in the EACCA. They shall confirm the final audited enrollment numbers no later than **5 p.m. on Dec. 16, 2021**. This certification ensures that CBOs have received and reviewed the outcome of the 2021-22 school year enrollment audit.

If a CBO does not confirm the final, audited enrollment numbers by the deadline, additional follow up may be conducted directly with the Pre-K Manager.

12. REPORTING



After receipt of the third and final audited enrollment certification, OSSE produces and disseminates the final enrollment audit report in January 2022.

APPENDICES

12.1. Appendix A: 2021-21 Enrollment Audit Data Elements

Category	Data Element	Definition	Source System	Permitted Values
Student Demographic	USI	The official state identifier for all students attending a District of Columbia high-quality pre-k program; assigned by OSSE.	Enrollment Audit and Child Count Application	10-digit numeric
Student Demographic	Local ID	A unique number of alphanumeric codes assigned to a student by the CBO.	Enrollment Audit and Child Count Application	Alphanumeric
Student Demographic	Last Name	The legal last name of the student.	Enrollment Audit and Child Count Application	Alpha
Student Demographic	Middle Name	The legal middle name of the student.	Enrollment Audit and Child Count Application	Alpha
Student Demographic	First Name	The legal first name of the student.	Enrollment Audit and Child Count Application	Alpha
Student Demographic	Date of Birth	The day, month, and year on which the student was born.	Enrollment Audit and Child Count Application	Numeric - mm/dd/yyyy
Student Demographic	Gender	A coded value representing the student's gender; gender is a person's actual sex or perceived sex.	OSSE Authoritative	F – female M – male X – non-binary
Student Demographic	Ethnicity	An indication that a student identifies as Hispanic or Latino.	Enrollment Audit and Child Count Application	H – Hispanic/Latino; N – not Hispanic/Latino
Student Demographic	Race	CBOs are required to categorize students in one or more of the permitted race categories.	Enrollment Audit and Child Count Application	AS – Asian BL – Black/African American AM – American Indian/Alaskan Native PI – Pacific Islander/Native

				Hawaiian WH – White/Caucasian
Student Demographic	Student Street Address	The number and name of the unit and street (and apartment, if applicable) where the student resides.	Enrollment Audit and Child Count Application	Alphanumeric
Student Demographic	Student City	The city where the student resides.	Enrollment Audit and Child Count Application	Alpha
Student Demographic	Student State	The abbreviation for the state (within the United States) or outlying area in which the student resides.	Enrollment Audit and Child Count Application	Two-letter standard state abbreviation
Student Demographic	Student ZIP Code	The number that identifies the postal delivery area in the United States in which the student resides.	Enrollment Audit and Child Count Application	5-digit or 5+4-digit numeric
Student Demographic	Student Ward	Student's ward of residence for students residing within the District of Columbia.	Generated by the DC Master Address Repository (MAR) based on CBO reported Student Street Address, Student City, Student State and Student ZIP Code	1, 2, 3, 4, 5, 6, 7, 8
Program information	Ward of State Indicator	An indication that the student is under DC foster care.	Populated by OSSE using data provided by CFSA	Yes – the student is under the care of the District's foster care system No – the student is not under the care of the District's foster care system
Program information	At-Risk Indicator	An indication that the student is homeless, in the District's foster care system, qualifies for TANF or SNAP, or that the high	Derived by OSSE based a student having at	Yes – the student is considered at-risk No – the student is not considered at-risk

		school student is one or more years older, than the expected age for the LEA-identified grade level.	least one indicator	
Program information	Homeless Indicator	An indication that the student is experiencing homelessness.	Enrollment Audit and Child Count Application and populated by OSSE based on data received through homeless data feeds (SIS and TCP)	Yes – the student has been identified as homeless No – the student has not been identified as homeless
Student Enrollment	CBO-Identified Grade Level	The grade level or primary instructional level at which a student enters and receives services in a school or an educational institution during a given academic session.	Enrollment Audit and Child Count Application	PK3 – Pre-kindergarten (3-year-olds) PK4 - Pre-kindergarten (4-year-olds)
Student Enrollment	UPSFF Grade Level	The translation of the student's CBO-identified grade level to the UPSFF weighting according to the student's CBO-identified grade level.	Derived by OSSE using CBO identified grade level and special program designations; students with missing or invalid CBO identified grade levels	PK3 – Pre-kindergarten (3 years old by Sept. 30) PK4 – Pre-kindergarten (4 years old by Sept. 30)

			are placed into age-appropriate grades	
Student Enrollment	Entry Date	The month, day, and year on which the student enters and begins to receive instructional services in a school or an institution during a given school year.	CBO	Numeric - mm/dd/yyyy
Student Enrollment	Duplicative Enrollment Indicator	An indication that the student is enrolled at more than one school and/or CBO.	Derived by OSSE based on the student's school of enrollment and USI in the daily data feeds	Yes – the student is currently enrolled at multiple schools No – enrolled at only one school

12.2. Appendix D: Additional Resources

Title	Location
Enrollment Audit and Child Count policy questions	Email: Antonio.Cannon@dc.gov osse.enrollmentaudit@dc.gov Pkeep.osse@dc.gov
Office of Enrollment and Residency Handbook	osse.dc.gov/sites/default/files/dc/sites/osse/publication/attachments/2021-22%20School%20Year%20Office%20of%20Enrollment%20and%20Residency%20Handbook.pdf